

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

UNITED STATES OF AMERICA      )  
                                      )  
                                      )  
v.                                 )  
                                     )      Crim. No. 05-10019-RGS  
XIEU VAN SON,                    )  
                                      )  
Defendant.                      )  
                                      )  
\_\_\_\_\_  
)

**JOINT MOTION TO ENLARGE TIME FOR DISPOSITION**

The United States and Defendant Xieu Van Son, by their respective undersigned counsel, jointly move this Court to continue the sentencing hearing in this case until after January 31, 2007.

As grounds for this motion, the parties represent that the additional time is requested in order to allow the defendant an opportunity to provide assistance in the prosecution of other individuals, as called for in the parties' plea agreement.

Specifically, the parties anticipate that Defendant Xieu Van Son will be a witness at the trial of his co-defendants, Daniel McElroy and Aimee King McElroy. At present, McElroy's and King's dispositive motions are pending in this case. It is anticipated that, once those motions have been decided, the case will be set for trial.

Under present circumstances, postponing sentencing is in the interest of both parties and serves the public interest as well.

Respectfully submitted,

/s/ Mark D. Smith /by PGL  
MARK D. SMITH, ESQ.  
Smith and Laredo, P.C.  
15 Broad Street, Suite 600  
Boston, MA 02109  
(617) 367-7984  
Counsel for Defendant Xieu Van Son

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul G. Levenson  
PAUL G. LEVENSON  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3147

October 3, 2006